

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER,

Plaintiff

V.

ANDREA CABRAL, SUFFOLK
COUNTY SHERIFF'S DEPARTMENT,
SUFFOLK COUNTY, and
CORRECTIONAL MEDICAL
SERVICES, INC.

Defendants

Civil Action No. 04-11935-DPW

DECLARATION OF DAVID S. SCHUMACHER

I, David S. Schumacher, depose and state the following:

1. I am an attorney with the law firm Goodwin Procter LLP, Exchange Place, Boston, Massachusetts, 02109, and a member in good standing of the bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.

2. Goodwin Procter is counsel to Plaintiff Sheila Porter ("Mrs. Porter") in the above-captioned proceeding. I submit this Declaration in support of Mrs. Porter's Opposition to the Motions to Strike filed by Andrea Cabral ("Ms. Cabral"), Suffolk County Sheriff's Department ("SCSD") and Suffolk County (collectively, "Suffolk Defendants") and Correctional Medical Services, Inc. ("CMS").

3. Attached hereto as Exhibit 1 are true and accurate copies of portions of the deposition of Sheila Porter.

4. Attached hereto as Exhibit 2 are true and accurate copies of portions of the deposition of Donna Jurdak.

5. Attached hereto as Exhibit 3 are true and accurate copies of portions of the deposition of Andrea Cabral.

Signed under the penalties of perjury this 9th day of December, 2005.

/s/ David Schumacher
David S. Schumacher